



**CENTER *for* MEDICAL  
INTEROPERABILITY**

July 17, 2018

**BY ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Mid-Band Spectrum Expansion between 3.7 and 24 GHz (GN Docket No. 17-183)**

Dear Ms. Dortch:

The Center for Medical Interoperability (CMI) represents a diverse group of healthcare systems and has a great interest in, and fully supports the mid band spectrum expansion.

As you may have heard from other supporters of the proposed mid band spectrum expansion, healthcare systems rely heavily on Wi-Fi for support of wireless clinical devices as well as enterprise traffic. In addition, guest users in many hospitals overwhelm Wi-Fi networks and consume upwards of 85% of both airtime and throughput. Healthcare urgently needs more mid band unlicensed spectrum to keep up with the growth of all manner of wireless devices in the patient care environment.

CMI agrees that the framework proposed in the June 12, 2018 ex parte letter filed by technology companies is a good compromise and represents an excellent starting point for a notice of proposed rulemaking.<sup>1</sup> In particular, CMI notes that the framework recognizes that indoor devices and outdoor devices should be treated differently given their potential impact on existing operations. CMI's members note that the amount of data, number of simultaneous sessions, and diversity of devices on healthcare Wi-Fi systems is growing substantially each year, and believe that the 6 GHz band is the answer to the challenge.

CMI agrees that both ex ante interference protection measures and a periodic database check are all essential parts of a comprehensive regulatory framework. Applying these functional requirements will pave the way for shared use of a new unlicensed band that could bring significant benefits to healthcare systems throughout the US.

<sup>1</sup> See Letter to Marlene H. Dortch, FCC\*\* Secretary, from Apple Inc., *et al.*, GN Docket No. 17-183 (filed June 12, 2018).

CMI looks forward to participating further in this proceeding, in particular, in evaluating more detailed technical information as it becomes available.

CMI encourages the Commission to move ahead with the NPRM and open the band for use as quickly as possible.

Respectfully submitted,

A handwritten signature in cursive script that reads "Ed Cantwell".

Ed Cantwell

President & Chief Executive Officer